



Order Filed on January 13, 2022
by Clerk
U.S. Bankruptcy Court
District of New Jersey

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UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

In Re:

ELAINA LIVA,

Debtor.

:
: Chapter 13
:
: Case No.: 19-25392
:
: STIPULATION AND
: PROTECTIVE ORDER
:
:

The relief set forth on the following pages is Ordered.

DATED: January 13, 2022

A handwritten signature in cursive script, reading "Rosemary Gambardella".

Honorable Rosemary Gambardella
United States Bankruptcy Judge

IT IS HEREBY STIPULATED AND AGREED, by and between Steven P. Kartzman, Chapter 7 Trustee ("the Trustee") and Jamie Willard ("Willard"), by and through their undersigned counsel, as follows:

1. Willard will produce to the Trustee 2019 and 2020 federal income tax returns for W Executive Suites, LLC and W Executive Suites II, LLC (hereinafter referred to as "the tax returns").

2. The Trustee and his professionals shall review the tax returns solely in connection with his review of Willard's finances in connection with a possible settlement of claims to be asserted against her on behalf of the Elaina Lava bankruptcy estate and not for any other purpose.

3. Neither the tax returns, nor the contents thereof, shall be shared with any other party.

4. Neither the tax returns, nor the contents thereof, shall be filed or shared with the court.

5. Within thirty (30) days of production of the tax returns to the Trustee, the Trustee and his professionals shall destroy the tax returns and shall not retain any copies either in document or electronic form.

6. The terms of this Stipulation of Confidentiality shall remain in effect and the undersigned parties shall be bound thereunder unless and until said terms are modified by

Stipulation or Order of the Court.

7. The undersigned counsel affirm that they have discussed this Stipulation of Confidentiality with their respective clients and made their respective clients aware of their confidentiality obligations hereunder.

MELLINGER KARTZMAN LLC
Attorneys for Trustee

By: Steven A. Jayson
Steven A. Jayson

LEVITT & SLAFKES, P.C.
Attorneys for Jamie Willard

By: Bruce H. Levitt
Bruce H. Levitt

Dated: January 3, 2022